

INTERIM POLICY

Interim NorthstarMLS AI Use Policy

Regional Multiple Listing Service of Minnesota, Inc. (NorthstarMLS)

Effective October 9, 2026

Interim approach: This Policy establishes essential safeguards for current AI use. A more comprehensive AI and data policy will follow.

1. Purpose

NorthstarMLS supports responsible innovation as Participants, Subscribers, and their technology providers incorporate artificial intelligence into brokerage services. NorthstarMLS must also ensure that MLS data is used consistently with the agreements, licenses, policies, and expectations under which it is contributed and distributed.

This interim Policy replaces the NorthstarMLS AI Pause Policy 2026. It provides basic rules while NorthstarMLS develops a more comprehensive policy and the technology necessary for more precise governance through Project NexusRE (Ostra).

2. Scope and relationship to existing rights

This Policy applies to Participants, Individual Participants, Subscribers, vendors, contractors, data licensees, and others using NorthstarMLS data with artificial intelligence. AI includes systems that dynamically generate, transform, rank, predict, or recommend outputs using machine learning, generative AI, natural-language processing, computer vision, or similar methods.

AI does not expand any existing right to access, copy, use, disclose, display, distribute, retain, or commercialize NorthstarMLS data. Every use must remain within the applicable Participant Agreement, Subscriber Agreement, RMLS Policy, data license, data-use selection, and written approval. If another requirement is more restrictive, it controls.

3. Uses permitted under this interim Policy

The following uses are permitted without separate case-specific approval, provided they remain within existing rights and satisfy Section 4:

- A Participant's use of its own original listing content that it created or lawfully obtained and has the right to use. NorthstarMLS does not restrict that use through this Policy. This does not include the RMLS compilation, other Participants' data, NorthstarMLS-created or licensed enhancements, confidential information, consumer information, or third-party content for which the Participant lacks rights.
- A reasonable, human-initiated use by a Participant or Subscriber in the ordinary course of brokerage or appraisal work. For example, a user may select a limited number of relevant listing records and use an AI tool to prepare a comparison, summary, draft communication, or professional analysis for human review.
- An internal brokerage use or an automated disclosure already permitted by an applicable NorthstarMLS agreement, policy, data license, or written approval, provided the AI use does not materially expand the data, purpose, users, recipients, or disclosure already authorized.
- An AI feature provided or expressly authorized by NorthstarMLS, used within the instructions, credentials, and limitations NorthstarMLS provides.

4. Minimum requirements for permitted AI use

When a permitted AI use includes NorthstarMLS data beyond a Participant's own original listing content, it must meet the following minimum requirements:

- The use must comply with all applicable NorthstarMLS agreements, policies, display requirements, confidentiality restrictions, seller instructions, and licensing limitations.
- NorthstarMLS data may not be used by an AI provider to train or improve a model, product, or service for the provider, other customers, or the public unless NorthstarMLS approves that use in writing.
- NorthstarMLS data and AI-generated outputs based on that data may not be sold, redistributed, disclosed, or used for an unrelated secondary purpose beyond the rights already granted.
- Confidential fields, private remarks, credentials, consumer personal information, and other nonpublic information may not be submitted to an AI system unless the use is authorized and appropriately protected.
- The use must comply with fair-housing, privacy, intellectual-property, advertising, licensing, professional-responsibility, and other applicable legal requirements.
- The Participant remains responsible for use by its Subscribers, employees, contractors, and vendors. Use of a third-party AI system does not transfer that responsibility to the provider.

5. Uses requiring prior written approval

Prior written NorthstarMLS approval is required for an AI use that:

- uses a data feed, API, automated export, or other NorthstarMLS data access for a new AI purpose not already authorized by an applicable agreement, AI addendum, data-use selection, or written approval;
- materially changes an authorized IDX, VOW, website, application, chatbot, property-matching service, automated communication, brokerage platform, or other product using NorthstarMLS data;
- trains, fine-tunes, or improves a model using NorthstarMLS data, or makes a model or AI capability developed from other Participants' data available outside the approved brokerage;
- creates a new commercial product, dataset, score, analysis, or other derived offering for licensing, sale, or distribution; or
- provides NorthstarMLS data to an AI vendor, model provider, or other party that is not already authorized to receive and use the data for that specific purpose.

NorthstarMLS may approve, deny, condition, limit, suspend, or revoke an AI use. An approval applies only to the identified purpose, data, users, system, provider, and duration and does not establish a precedent or continuing right.

6. Replication and existing data feeds

This interim Policy does not create a new prohibition on replication, storage, caching, or other handling of NorthstarMLS data. Those activities remain governed by existing NorthstarMLS agreements, policies, data licenses, data-use selections, and written approvals. This Policy neither expands nor reduces the rights granted by those documents except as expressly stated for AI use.

A party's possession of a data feed or replicated copy does not, by itself, authorize a new AI use. Conversely, a copy that is permitted under an existing agreement is not prohibited merely because this interim Policy anticipates that future NorthstarMLS policy may address replication differently.

7. Future policy reserved

This is a limited interim Policy, not NorthstarMLS's final position on AI or data governance. NorthstarMLS reserves the right to adopt a more comprehensive policy, revise its agreements and licenses, establish technical requirements, and require migration of existing or approved uses through the process and notice required by applicable agreements and RMLS Policies.

Future policy may address, among other subjects:

- non-replication requirements and the reduction or elimination of persistent downstream copies;
- governed, live, or on-demand access through Project NexusRE (Ostra) or other NorthstarMLS-controlled services;
- storage, caching, retention, deletion, embeddings, vector databases, retrieval-augmented generation, and other persistent representations;
- approved models and providers, model training, cross-client learning, derived data, commercialization, attribution, and provenance;
- privacy, fair housing, security, incident reporting, transparency, human oversight, and audit requirements; and
- identity, entitlements, usage limits, metering, pricing, enforcement, and transition of existing feeds and approvals.

No permitted use or interim approval creates a vested right to continue the use after a future policy, agreement, license, or technical requirement becomes effective.

8. Administration and enforcement

NorthstarMLS may request information reasonably necessary to understand and verify an AI use. A Participant, Subscriber, or vendor must promptly stop an unauthorized use, cooperate with NorthstarMLS, and report a material unauthorized disclosure, security incident, or provider use of NorthstarMLS data for unapproved model training or improvement.

Violations are subject to the enforcement and remedies available under applicable RMLS Policies, agreements, and data licenses, including suspension or termination of data access where authorized. Nothing in this Policy limits other rights or remedies available to NorthstarMLS or affected Participants.

This Policy supersedes the NorthstarMLS AI Pause Policy 2026 upon its effective date. NorthstarMLS will review it periodically and may replace, amend, or rescind it as its permanent AI and data-governance framework develops. Questions and approval requests should be directed to NorthstarMLS COO Mike Bisping at mbisping@northstarmls.com.